

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

KHAIRUL ANNAM and NAHEED AFROZ,

Plaintiff,

-against-

CITY OF NEW YORK, NEW YORK CITY
DEPARTMENT OF BUILDINGS, MELANIE E.
LA ROCCA, Commissioner, TIMOTHY E.
HOGAN, MATTHEW MILLNER, LEONID
MILLER, YEGAL SHAMASH, GEOFFREY B.
EISELE, JOSEPH ACKROYD, KEVIN
SCHULTZ, MATTHEW DIBONO, LISTORIEL
VASQUEZ,

Defendants.

----- X
**DECLARATION OF ASSISTANT
CORPORATION COUNSEL
STEPHEN M. SUHOVSKY IN
SUPPORT OF DEFENDANT'S
MOTION TO DISMISS**

No. 22 Civ. 02945 (LGS)

STEPHEN M. SUHOVSKY, pursuant to 28 U.S.C. § 1746, and subject to the
penalty of perjury, declares that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for Defendants in the above-captioned matter.
2. I respectfully submit this declaration in support of Defendant's Motion to Dismiss the Second Amended Complaint.
3. Annexed hereto as Exhibits "A" is a copy of Second Amended Complaint.
4. Annexed hereto as Exhibit "B" is a true and accurate copy of the Plaintiffs' Notice of Claim.
5. Annexed hereto as Exhibit "C" is a true and accurate copy of the Plaintiffs' Complaint filed in New York State Supreme Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
September 7, 2022



151
Stephen M. Suhovsky
Assistant Corporation Counsel